

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN**

PARAGON COMPONENT SYSTEMS,  
LLC,

Plaintiff,

Case No. 3:25-cv-00170-wmc

v.

QUALTIM, INC., CENTER FOR  
BUILDING INNOVATION, LLC,  
DRJ ENGINEERING, LLC, INSPIRED  
PURSUITS, LLC, KIRK GRUNDAHL,  
and SUZANNE GRUNDAHL,

Defendants.

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**PLAINTIFF PARAGON COMPONENT SYSTEMS, LLC’S  
RESPONSE TO MOTION TO SEAL ADDITIONAL EXHIBITS**

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Defendants filed a Motion to Seal Additional Exhibits on May 29, 2025. Doc. 107. The Court did not set a briefing schedule, but instead granted the motion in a text order on May 30, 2025, based on Defendants’ representation that “the exhibits warrant sealing and were filed without their consultation.” Doc. 108. Plaintiff respectfully submits this response to preserve its objections and clarify the record.

First, Plaintiff did not file the additional exhibits that Defendants sought to seal. *Defendants publicly filed them* as exhibits to their own briefs. The documents at issue are Docs. 54-3, 54-4, 54-20, 54-21, 54-22, and 54-23, which are exhibits to the *Defendants’* reply brief in support of their motion to dismiss (Doc. 54), and Docs. 29-9 and 29-10, which are already redacted exhibits to the *Defendants’* motion to dismiss (Docs. 21, 29).

Second, Plaintiff maintains the information contained in these exhibits are not trade secrets as Defendants allege. *See* Doc. 107 (“Rights of a Trade Secret Owner”). Defendants do not attempt to make a *prima facie* showing that these documents satisfy the elements of a trade secret under state or federal law. Quite the opposite, Defendants acknowledge “the exhibits have been public domain for some time.” Doc. 107 at 2. Plaintiff reserves the right to seek unsealing of these exhibits and to object to any continued arguments by Defendants that they contain trade secrets.

Dated this 2<sup>nd</sup> day of June, 2025.

**GASS TUREK LLC**

*s/Tamar B. Kelber*

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*Attorneys for Plaintiff Paragon  
Component Systems, LLC*

**CERTIFICATE OF SERVICE**

I certify that on June 2, 2025, a copy of the foregoing Plaintiff Paragon Component Systems, LLC's Response to Motion to Seal Additional Documents is being served on all counsel of record by electronically filing it via the Court's filing system.

*s/Tamar B. Kelber*

Tamar B. Kelber  
Counsel for Plaintiff